Serial Number 09/495,597

PU020209

-6-

REMARKS

Claims 1-8 are pending. Claim 7 and 8 are new.

Applicants have amended Claim 1 to change the antecedent basis of the normalized bitmap representation element of the Claim from "the" to "a". No new matter was added to the Claim.

Applicants have added new Claim 7 to claim a method to search for images using values representing an aspect ratio, and a specified density value. Support for this method is found in the specification on page 12, lines 1-14, and in other places.

I. Rejection under 35 U.S.C. § 102(e)

Claims 1 and 2 are rejected under 35 U.S.C. 102(e) as being anticipated by Leow et al. (U.S. Patent #6,192,150 hereafter Leow). Applicants disagree with this ground of rejection.

Claim 1 specifically claims the element of, "the largest connected blob to form an un-normalized bitmap." This claimed element is not disclosed or suggested in the Leow reference. Specifically in the Office Action, the Examiner stated that this claimed element is found in Leow by the, "extract texture features at a plurality of spatial frequencies and orientations," (Leow, column 3, lines 50-59). Applicants disagree.

Moreover, Leow uses Gabor filters at different center spatial filters to extract texture features of images such as texture patterns (Leow, column 3, lines 50-54). More specifically, texture patterns are identified in Leow as objects that have textures such as, "sand, grass or brick," (Leow, column 3, lines 13-15). These texture patterns are not the same as "the largest connected blob" as

Serial Number 09/495,597

PU020209

-7-

claimed in Claim 1, as Gabor filters are used in a different manner in Leow, which are not concerned with identifying a "blob" as in Claim 1.

For the reasons given above, independent Claim 1 is believed to overcome the rejection under 35 U.S.C. § 102(e), and Applicants request that the rejection of Claim 1 be removed. Applicants also believe that Claims 2 overcomes the rejection under 35 U.S.C. § 102(e), for the forgoing reasons cited for Claim 1. Applicants request that the rejection to Claim 2 be removed.

II. Rejection under 35 U.S.C. § 103(a)

Claim 3 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Leow et al. in view of Poggio et al. (US Pat No. 5,774,129 hereafter Poggio). The Applicants disagree with this ground of rejection.

Claim 3 specifically claims the element of having an un-normalized bitmap normalized as to have a representation that "has a standard height and is oriented such that the principle direction is along a vertical direction." The Examiner in the Office Action stated that such an element is found in Poggio. Applicants disagree as neither Leow nor Poggio, alone in combination disclose or suggest this feature.

In Poggio, the reference states that the shape of an object is approximated, "in a conventional manner by pixelwise correspondences that are matrices of horizontal and vertical displacements from a reference image," (column 11, lines 61-65, emphasis added). This approximation is not the same as normalizing a bitmap representation such that the presentation has, "a standard height and is oriented such that principal direction is along a vertical direction," as claimed in Claim 3. Poggio does not perform the normalization of Claim 3 because Poggio uses matrices of horizontal and vertical displacements, a different technique for identifying image information.

For the reasons given above, dependent Claim 3 is believed to overcome the rejection under 35 U.S.C. § 103(a), and Applicants request that the rejection

Serial Number 09/495,597

PU020209

-8-

of Claim 3 be removed. Applicants also believe that Claims 4-6 overcome their respective rejections under 35 U.S.C. § 103(a), for the forgoing reasons cited above in connection for Claim 1. Applicants request that the rejection to Claims 4-6 be removed, as well.

Respectfully submitted,

T. NAVEEN ET AL.

By: Joel M. Fogelson

Reg. No. 43,613

Tel. (609) 734-6809

Patent Operations
Thomson Multimedia Licensing, Inc.
P. O. Box 5312
2 Independence Way,
Princeton, New Jersey 08543
May 28, 2003

Certificate of Transmission under 37 C.F.R. 1.8

I hereby certify that this correspondence is being faxed to the United States Patent and Trademark Office at (703) 872-9314 on May 28, 2003.

Joel M. Fogelson